

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**TALECRIS BIOTHERAPEUTICS, INC., and)
BAYER HEALTHCARE LLC,)**

Plaintiffs,)

v.)

**BAXTER INTERNATIONAL INC., and)
BAXTER HEALTHCARE CORPORATION,)**

Defendants.)

C.A. No. 05-349-GMS

Jury Trial Demanded

**BAXTER HEALTHCARE CORPORATION,)
Counterclaimant,)**

v.)

**TALECRIS BIOTHERAPEUTICS, INC., and)
BAYER HEALTHCARE LLC,)**

Counterdefendants.)

PLAINTIFFS' NOTICE OF DEPOSITION OF JULIE KIM

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that beginning on September 11, 2006 at 9:30 a.m., at the Hyatt Westlake Plaza in Thousand Oaks, 880 S. Westlake Blvd., West Lake Village, California, 91361, counsel for Plaintiffs Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC will take, pursuant to Federal Rules of Civil Procedure 28 and 30, the deposition upon oral examination of Julie Kim.

The deposition will be taken before an officer authorized to administer oaths and will continue from hour to hour and day to day until completed. You are invited to attend and cross-examine.

Please be advised that this deposition may be recorded by videotape in addition to stenographic recording, which will include the use of LiveNote real time transcription.

Date: August 24, 2006

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Jeffrey B. Bove

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CERTIFICATE OF SERVICE

I, JEFFREY B. BOVE, do hereby certify that I caused a true copy of the foregoing document, **PLAINTIFFS' NOTICE OF DEPOSITION OF JULIE KIM**, to be served upon the below listed in the manner indicated on August 24, 2006.

Via Hand Delivery and E-Mail

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By: /s/ Jeffrey B. Bove
Jeffrey B. Bove (# 998)